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February 21, 2023

VIA CM/ECF

Hon. Magistrate Judge James L. Cott
United States District Court
Southern District of New York
500 Pearl Street, Room 1360
New York, NY 10007

Re: *Matchroom Boxing Limited et al., v. Jake Paul*, No. 7:22-cv-08178-PGG-JLC

Dear Judge Cott:

I represent defendant Jake Paul (“Defendant”) in the above referenced action.

I respectfully submit this correspondence pursuant to Rule I(E) of the Court’s Individual Practices to request a brief extension of time to file a substantive response to plaintiffs’ letter motion for discovery [Dkt No. 32], which is presently due by February 23, 2023 under this Court’s individual Rule II(B).

I am the lead counsel for Defendant in this litigation and the sole attorney at my firm with personal knowledge of the parties’ discovery disputes. As I advised plaintiffs’ counsel yesterday, I am on vacation this week with my wife and three children while New York City’s public schools are closed. Nonetheless, plaintiffs’ counsel refused to wait until my return to the office next week to file his discovery motion. I respectfully request the Court extend Defendant’s time to respond to plaintiffs’ letter motion to 5:00 pm on February 27, so that Defendant can properly detail his response and cross-motion for an order finding that plaintiffs waived the right to depose defendant and sanctioning plaintiffs for their disobedience of the Court’s prior order for jurisdictional discovery.

Very truly yours,

/s/ Kevin Fritz

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